

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No: 22-11068 (JTD)

(Jointly Administered)

Hearing: August 15, 2024 at 1:00 p.m. (ET)

Objection Deadline: July 26, 2024 at 4:00 p.m. (ET)

**NOTICE OF EDEN PROTOCOL LIMITED'S
MOTION FOR ENTRY OF ORDER (I) GRANTING
RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362(d)(1),
(II) WAIVING BANKRUPTCY RULE 4001, AND (III) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on July 12, 2024, Eden Protocol Limited (the “Movant”), by and through its undersigned counsel, filed *Eden Protocol Limited's Motion for Entry of an Order (I) Granting Relief from the Automatic Stay Under 11 U.S.C. § 362(d)(1), (II) Waiving Bankruptcy Rule 4001, and (III) Granting Related Relief* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **August 15, 2024 at 1:00 p.m. (ET)** before The Honorable John T. Dorsey, Chief United States Bankruptcy Judge for the District of Delaware, at the Court, 824 North Market Street, 5th Floor, Courtroom 5, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the entry of an order granting the relief sought in the Motion must be in writing and filed with the Court on or before **July 26, 2024 at 4:00 p.m. (ET)** (the “Objection Deadline”). At the same time, you must serve a copy of the response or objection upon the undersigned counsel to the Movant so as to be received

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Rule 4001-1(d), the attorneys for the parties shall confer with respect to the issues raised by the Motion in advance of the hearing for the purpose of determining whether a consensual order may be entered and/or for the purpose of stipulation to relevant facts.

DATE: July 12, 2024

COLE SCHOTZ P.C.

/s/ Melissa M. Hartlipp

Melissa M. Hartlipp (No. 7063)
500 Delaware Avenue, Ste. 1410
Wilmington, Delaware 19801
Tel: (302) 651.2011
mhartlipp@coleschotz.com

-and-

Jacob S. Frumkin (*pro hac vice* admission pending)
Court Plaza North
25 Main Street
Hackensack, NJ 07601
Tel: (201) 489-3000
jfrumkin@coleschotz.com

Attorneys for Eden Protocol Limited